

DANIEL CALABRO, Jr. (*admitted pro hac vice*)
24 Pettaconsett Avenue, Unit F
Cranston, RI 02920
Telephone: (401) 203-0470
Facsimile: (888) 461-1955
email: CalabroLaw@gmail.com

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA

vs.

JOHANNES W. THALER

Case No. 2:12-CR-00645

**DEFENDANT'S RESPONSE TO
GOVERNMENT'S MOTION TO QUASH
SUBPOENAS [874]**

Defendant Johannes W. Thaler hereby responds to the Government's Motion to Quash Subpoenas, Dkt. 874.

On September 25, 2014, the Government filed their Motion to Quash Subpoenas which had been served upon current and former government employees. In their Motion, the Government listed some of the witnesses for which they moved to have subpoenas quashed as well as others in a sealed filing.

On September 29, 2014, Defendant Robert Lustyik pleaded guilty and as such is no longer going to trial in this matter. The listed witnesses in the Government's Motion were to be called for the benefit of Mr. Lustyik and as such will no longer be required for trial. Mr. Thaler does not require nor does he intend to call any of the government witnesses listed in the Government's Motion to Quash and as such their Motion should be moot.

Respectfully Submitted by counsel for Defendant
Johannes Thaler

/s/ Daniel Calabro

Daniel Calabro, ESQ.
24 Pettaconsett Avenue, Unit F
Cranston, RI 02920
Tel: (401) 203-0470
Fax: (888) 461-1955

CERTIFICATION

I hereby certify on September 29, 2014, I filed a true and accurate copy of this Response via the CM/ECF system.

/s/ Daniel Calabro